

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION**

**No. 2:12-MD-02323-AB
MDL No. 2323**

This relates to:

ERIC CURRY

**PETITION TO ESTABLISH
ATTORNEYS' LIEN**

PETITION TO ESTABLISH ATTORNEYS' LIEN

Now, comes the Petitioner, Marc Davies, Esq. for Edward Stone Law P.C. ("Stone") pursuant to O.C.G.A. § 15-19-14 and states as follows:

1. The Petitioner is an attorney at law admitted to practice before this court, in the above captioned matter, and files this petition to establish a lien for attorney's fees as set forth herein.
2. On or about August 5, 2014, Petitioner was retained by the Plaintiff, Eric Curry (the "Client" or the "Plaintiff") pursuant to a contingent fee agreement ("Fee Agreement"), to pursue a claim for injuries and damages against the National Football League ("NFL"), and any other entities who are or may be legally liable or responsible, in whole or in part, incurred by the Plaintiff as a result of head injuries and concussions sustained by Plaintiff while playing in the NFL.

3. The Fee Agreement provides for compensation to the Petitioner on a contingent fee basis before all expenses and costs are deducted from the Plaintiff's share of recovery. In the event of no recovery, the Plaintiff shall owe Petitioner nothing for attorneys' fees, costs or expenses.

4. When Petitioner entered into the Fee Agreement with Plaintiff, he undertook the risk and expense of the litigation.

5. Petitioner provided legal services and advice to Plaintiff, including the preparation of Objections filed in this matter, until terminated by Plaintiff on or about October 15, 2015.

6. Petitioner was not terminated by the Plaintiff for cause, and the termination was not due to any malfeasance or other improper action on the part of Petitioner.

7. Petitioner claims the right to have a lien for attorneys' fees and expenses established and enforced in the amount of \$15,498.66 upon any sums to be derived from any settlement or judgment obtained or to be obtained by Plaintiff in this action.

Dated: June 15, 2017

Respectfully submitted,

/s/ Marc Davies
Marc Davies (PA#81789), *Of Counsel*
Edward S. Stone (CT#412255)
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Greenwich, CT 06830
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above document was served on all parties on this 15th day of June, 2017, by filing the document in the Court's ECF filing system, which gives e-mail notice to all attorneys of record.

/s/ Marc Davies
Marc Davies